

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF TENNESSEE
3 NASHVILLE DIVISION

3 -----
4 JANE DOE,)
5)
6 Plaintiff,)
7)
8 VS.) NO. 3:20-CV-01023
9) Jury Demand
10 THE METROPOLITAN GOVERNMENT) Judge Trauger
11 OF NASHVILLE AND DAVIDSON) Magistrate Judge
12 COUNTY, TENNESSEE, AND) Holmes
13 DR. ADRIENNE BATTLE,) Lead Case
14)
15 Defendant.)
16 -----)
17 DR. LILY MORENO LEFFLER,)
18)
19 Plaintiff,)
20)
21 VS.)
22)
23 THE METROPOLITAN GOVERNMENT OF)
24 NASHVILLE AND DAVIDSON)
25 COUNTY, TENNESSEE and)
26 DR. ADRIENNE BATTLE,)
27)
28 Defendants.)
29 -----

30 DEPOSITION OF ANTHONY HALL
31 Taken on April 11, 2022

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1	1 S T I P U L A T I O N S
2	2
-----	3 The deposition of ANTHONY HALL was taken on the
3 PREPARED BY:	4 11th day of April, 2022, by notice, on behalf of the
4	5 plaintiff, via Zoom, beginning at approximately
5 CRISTI G. WATSON, LCR	6 2:00 p.m. for all purposes allowed under the Tennessee
5 Briggs & Associates	7 Rules of Civil Procedure.
6 222 Second Avenue North, Suite 340M	8 It is agreed that Cristi G. Watson, LCR, may
6 Nashville, Tennessee 37201	9 swear the witness, take the deposition by stenographic
6 Cristicr@bellsouth.net	10 means and afterwards reduce same to typewritten form.
7 615-424-0999	11 All formalities as to notice, caption,
8	12 certificate, and signing, et cetera, of the deposition
9	13 are waived. All objections, except as to the form of
10	14 the questions, are reserved to the hearing of said
11	15 matter.
12	16
13	17
14	18 (Unless previously provided, all proper names are
15	19 spelled phonetically to the best of the court
16	20 reporter's ability.)
17	21
18	22
19	23
20	24
21	25
22	
23	
24	
25	
Page 3 Page	Page 5 Page
1 A P P E A R A N C E S	1 ANTHONY HALL,
2	2 having been duly sworn, testified as follows:
3 FOR PLAINTIFFS BAILEY, LEFFLER,	3 EXAMINATION
3 MERIWETHER, DOE:	4 BY MS. STEINER:
4 Ann Buntin Steiner	5 Q. Mr. Hall, I am Ann Steiner. I am here to
Attorney at Law	6 take your deposition today. I represent two parties
5 Steiner & Steiner, LLC	7 who have sued Metro government for retaliation. That
613 Woodland Street	8 would be (name redacted), who we will call Jane Doe
6 Nashville, Tennessee 37204	9 throughout the lawsuit, Dr. Pippa Meriwether; Dr.
Asteiner@steinerandsteiner.com	10 James Bailey; Dr. Lily Leffler; and then Jesse Harbison
7	11 is here who represents Dr. Damon Cathey. Okay?
8 FOR PLAINTIFF CATHEY:	12 A. Okay.
9 Jesse Ford Harbison	13 Q. Mr. Hall, could you state your full name
Attorney at Law	14 for the record?
10 Jesse Harbison Law, PLLC	15 A. My name is Anthony Lee Hall.
P.O. Box 68251	16 Q. Where are you employed?
11 Nashville, Tennessee 37206	17 A. Metro Nashville Public Schools.
jesse@jesseharbisonlaw.com	18 Q. What is your position there?
12	19 A. Coordinator for Office Of Restorative
FOR THE DEFENDANTS:	20 Practices.
13	21 Q. Do you know my client, Jane Doe?
J. Brooks Fox	22 A. Correct.
14 Attorney at Law	23 Q. How long have you known her?
Metropolitan Courthouse, Suite 108	24 A. A few years.
15 P.O. 196300	25 Q. Do you know any of the other plaintiffs,
Nashville, Tennessee 37219	
16 brooks.fox@nashville.gov	
17 -----	
18 I N D E X	
19 Examination by Ms. Steiner	5
20	
EXHIBITS	
21	
22 No exhibits were marked.	
23	
24	
25	

Briggs & Associates 615/482-0037

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1 Dr. Pippa Meriwether, Dr. James Bailey, Dr. Lily 2 Leffler, Dr. Damon Cathey? 3 A. Yes, I know Dr. Meriwether, Dr. Cathey. 4 I know Dr. Bailey. 5 Q. At Restorative Practices what do you do? 6 A. Primarily our role is to train staff on 7 nonpunitive proactive strategy to support students and 8 their families as well as the staff. 9 Q. Do you step in if there is a problem with 10 someone's job performance? 11 A. Say that again. 12 Q. Does your department step in if there is 13 a problem with job performance? 14 A. If there is -- not a job performance, no. 15 We will step in if there is a conflict between -- if 16 we're asked to maybe do a restorative support, there 17 are two staff members who might have a conflict, but 18 not necessarily their performance, just about their 19 individual personalities. 20 Q. If someone has trouble getting along with 21 others and it needs to be brought to your attention, 22 your department will step in to try to correct it, 23 correct? 24 A. We will try to support the best way we 25 know how.	1 Q. Did anyone bring to your attention that 2 Dr. Lily Leffler was having trouble getting along with 3 anybody? 4 A. No. I am not that very familiar with 5 her, no. 6 Q. Did you know that Jane Doe applied for a 7 position as a restorative practices specialist? 8 A. Correct. 9 Q. That's different than a restorative 10 practices -- what is it? Is it associate or assistant? 11 A. Assistant, yes. 12 Q. What type educational requirements do you 13 need to be a restorative practices specialist? 14 A. We require that a person has a degree in 15 related fields or they also may have a degree in maybe 16 another field but they have work experience related to 17 social justice, equity education maybe. 18 Q. Is that like equity, diversity, and 19 inclusion type area? 20 A. It can. 21 Q. Did you think Jane Doe had that type 22 experience, I think it's called EDI? 23 A. I can't recall exactly. I know she was 24 eligible for an interview, so I would think she had 25 some experience in that area.
Page 7 Page	Page 9 Page
1 Q. Do the other supervisors at Metro have a 2 job duty for reporting to you if there is an issue with 3 someone getting along with others? 4 A. Ask that again. You broke up. 5 Q. Do the supervisors have a job duty for 6 reporting to you or to your department that there is an 7 issue if one of the employees has a problem dealing 8 with others? 9 A. I can't speak to if that's a job duty. I 10 am not sure what principal job duties are executive 11 directors. Say if it is brought to our attention and 12 it's something that we can support, both staff members, 13 then we will do that. 14 Q. Does that extend to if there is an issue 15 with an executive director getting along with others; 16 is that brought to your attention? 17 A. I never had one at that level. Most 18 things I have experienced has been pretty much either 19 parent and teacher or parent and administrator. I 20 never had to deal with anything on the executive 21 director level. 22 Q. But you could if you were asked to, 23 correct? 24 A. I would think that I could. I would like 25 to believe in my confidence I could.	1 Q. Did you meet her? Do you recall meeting 2 with Jane Doe about the job? 3 A. I spoke with her in interview process, 4 correct. 5 Q. Did you speak with her outside Metro 6 schools? 7 A. I spoke with her and asked her just 8 basically here is kind of what the salary range is, 9 here is the responsibilities, do you think this is 10 something you would like to do, so, yes. 11 Q. Did you meet with her outside away from 12 Metro schools? 13 A. Yeah. We had a conversation at the YMCA. 14 Q. Did you recommend -- did you want to hire 15 Jane Doe as a restorative practice specialist? 16 A. Initially she did have the scores that 17 were required; she did have the scores that she would 18 be eligible for hire. 19 Q. When you hire someone or recommend that 20 you want to hire somebody, do you send it to HR? 21 A. Yes, it goes to HR. 22 Q. Did you send a request to HR to be 23 allowed to hire Jane Doe? 24 A. Yes. 25 Q. When you said she had the scores, what

<p>1 are you talking about?</p> <p>2 A. Just meant that based on the interview</p> <p>3 process that we felt that she answered the questions</p> <p>4 well and that she was certainly a candidate for hire.</p> <p>5 Q. Who is we? Did someone other than you or</p> <p>6 along with you interview her?</p> <p>7 A. Just my initial team. The others are</p> <p>8 restorative practice specialists.</p> <p>9 Q. Who would that be?</p> <p>10 A. That would be Renee Malbrough, Lamar</p> <p>11 Moore, Melissa Gordon.</p> <p>12 Q. Did all four of you interview Jane Doe?</p> <p>13 A. If I remember correctly, I believe all</p> <p>14 four of us did.</p> <p>15 Q. Was it like a group decision to try to</p> <p>16 hire her into the position?</p> <p>17 A. Yes.</p> <p>18 Q. What was the salary range? Do you</p> <p>19 recall?</p> <p>20 A. Her salary range was outside of the</p> <p>21 parameters I had for my budget. I can't remember. I</p> <p>22 want to say with her experience and her education and</p> <p>23 everything, I want to say it exceeded like 80,000, but</p> <p>24 I am not a hundred percent certain. That's been a</p> <p>25 couple of years ago.</p>	<p>Page 10</p> <p>1 told her what the salary range for that job was?</p> <p>2 A. I don't recall. It's been a while ago.</p> <p>3 I am pretty sure that I probably said to her that your</p> <p>4 salary is beyond what my budget allows, but I can't</p> <p>5 swear to it.</p> <p>6 Q. My issue is this. I thought you said a</p> <p>7 second ago that when you interviewed with her you told</p> <p>8 her what the salary range for that job was?</p> <p>9 A. I don't recall saying that.</p> <p>10 Q. When you interview for this job, does the</p> <p>11 application show what the salary is?</p> <p>12 A. That's a HR question. I don't think so,</p> <p>13 but I am not a hundred percent certain. That would be</p> <p>14 HR. I typically leave that to HR.</p> <p>15 Q. Now, so when you interviewed her, you</p> <p>16 really weren't so much concerned about salary; you were</p> <p>17 more concerned about her qualifications, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Then who did you actually hire into that</p> <p>20 position?</p> <p>21 A. Let's see. I hired Jekia Allen.</p> <p>22 Q. Ms. Allen -- what is she paid?</p> <p>23 A. She is around the 62 range. I don't know</p> <p>24 exact. She has been here a few years. I don't know</p> <p>25 her exact salary.</p>
<p>1 Q. It exceeded 80,000?</p> <p>2 A. If I remember correctly. I know that it</p> <p>3 was definitely out of line in comparison with the other</p> <p>4 staff members that I had.</p> <p>5 Q. What's the range for the other staff</p> <p>6 members?</p> <p>7 A. About 62,000.</p> <p>8 Q. What's the range? What does it go from?</p> <p>9 A. I want to say it goes -- I don't have</p> <p>10 that in front of me, so I am not a hundred percent</p> <p>11 certain but maybe 55 to 62.</p> <p>12 Q. Do you know what her position was when</p> <p>13 she applied for that job?</p> <p>14 A. I think she was a school teacher at John</p> <p>15 Trotwood Moore at that time.</p> <p>16 Q. Do you know what the range was for that?</p> <p>17 A. No idea.</p> <p>18 Q. So how do you know -- when you said she</p> <p>19 exceeded it by 80,000, did you mean she was up at</p> <p>20 135,000?</p> <p>21 A. No. I am saying the salary that I</p> <p>22 believe with her experience that came back was around</p> <p>23 80,000, not in addition to her salary but around</p> <p>24 80,000.</p> <p>25 Q. Did you tell her -- I think you said you</p>	<p>Page 11</p> <p>1 Q. So what happened was your group</p> <p>2 interviewed Ms. Doe, and you said she was the one you</p> <p>3 wanted to hire, correct?</p> <p>4 A. No, I said that she certainly fit the</p> <p>5 criteria.</p> <p>6 Q. You sent it to HR for approval, correct?</p> <p>7 A. Yes, that was the next step.</p> <p>8 Q. If HR had approved it, you would have</p> <p>9 hired her, correct?</p> <p>10 A. If they could have gotten the salary</p> <p>11 respectable. I would think that she was definitely a</p> <p>12 very, very high candidate.</p> <p>13 Q. What was the salary range you would have</p> <p>14 approved her with?</p> <p>15 A. Sixty-two thousand.</p> <p>16 Q. Anything higher?</p> <p>17 A. No. I don't have any authority beyond</p> <p>18 that.</p> <p>19 Q. Does HR have the authority beyond that?</p> <p>20 A. I can't answer that. That is an HR call.</p> <p>21 Q. So then when you sent it to HR, who at HR</p> <p>22 handled it?</p> <p>23 A. I am not sure, because it's a platform</p> <p>24 called Taleo, so I go on there and if there are</p> <p>25 candidates that bubble up, I can then select them as</p>

<p style="text-align: right;">Page 14</p> <p>1 the next phase. I don't recall if there was a specific 2 individual that that goes to. I just use the platform 3 we have.</p> <p>4 Q. Did you talk to anyone in HR?</p> <p>5 A. Just sent e-mails. I sent e-mails to our 6 HR manager, Angela Johnson, to ask like tell me a 7 little bit about where I am in my parameters with this.</p> <p>8 Q. What did she tell you?</p> <p>9 A. We didn't really get anything because she 10 was in and out, and then she eventually resigned the 11 position.</p> <p>12 Q. When you say she was in and out, what do 13 you mean?</p> <p>14 A. I never really could get ahold of her. I 15 don't know what her deal was. I don't know if she was 16 on vacation, medical, or whatever, but I e-mailed her 17 multiple times and called her on our teams channel and 18 didn't really get anything from her.</p> <p>19 Q. Did you finally hear from anyone at HR?</p> <p>20 A. I can't remember who it was or it just 21 came back, but when they shared the salary range, and 22 that might have come from Ms. Johnson, but I wouldn't 23 swear to it, when HR sent back the salary range, I knew 24 at that time that went beyond what we were able to pay 25 out of our budget.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Step number for the salary schedule for 2 restorative practices specialist?</p> <p>3 A. I don't know. I don't know what the 4 steps are.</p> <p>5 Q. Were you aware that the steps would go 6 from somewhere like \$34 an hour up to \$51 an hour?</p> <p>7 A. No, I was not.</p> <p>8 Q. Let me show you something. Can you see 9 this support pay scale I have here?</p> <p>10 A. Can you enlarge it a tad bit, please.</p> <p>11 Q. How is that?</p> <p>12 A. Better, thank you.</p> <p>13 Q. Are you familiar with this?</p> <p>14 A. A little bit. Not a lot.</p> <p>15 Q. Is this the pay schedule for restorative 16 practices specialist?</p> <p>17 A. I cannot say. I don't see restorative 18 practices on there anywhere. I don't know if it is or 19 not.</p> <p>20 Q. Sixty-two thousand a year is somewhere 21 around \$30 an hour, correct?</p> <p>22 A. That sounds right.</p> <p>23 Q. Who told you that you were limited to \$30 24 an hour for that position?</p> <p>25 A. I'll say again I don't recall if it was</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Did anyone from HR tell you that Ms. 2 Johnson had been told by Lisa Spencer she could not 3 hire Jane Doe because Jane Doe had a lawsuit against 4 the district?</p> <p>5 A. No. No one told me that.</p> <p>6 Q. Did you know anything about Ms. Johnson 7 left Metro schools because she thought Metro schools 8 was trying to get her to do something unethical?</p> <p>9 A. No idea.</p> <p>10 Q. So it was HR that told you that the 11 salary was outside the range, correct?</p> <p>12 A. Right.</p> <p>13 Q. Did they tell you how far outside?</p> <p>14 A. I don't recall that, no. Like I said, I 15 know that it was up around high seventies, eighties, 16 and that exceeded what my budget allowed for.</p> <p>17 Q. Who told you that, though?</p> <p>18 A. When you go on the platform, I don't 19 recall if that was an individual person. That's been a 20 while ago. I don't remember if it was Ms. Johnson or 21 that bounced back from Taleo platform. I am not a 22 hundred percent certain. Could have been either one.</p> <p>23 Q. What's the step for restorative practices 24 specialist?</p> <p>25 A. Say that part again.</p>	<p style="text-align: right;">Page 17</p> <p>1 Ms. Johnson or that was a response from the Taleo 2 platform around what the salary range was. I really 3 don't get into salary a whole, whole lot. I leave that 4 up to HR because I --</p> <p>5 Q. Mr. Hall, how did you know that --</p> <p>6 MR. FOX: Objection. The witness wasn't 7 finished with his answer I don't believe. Were you?</p> <p>8 THE WITNESS: No. I am just saying my 9 answer hasn't changed. I can't change anything other 10 than I don't recall 100 percent whether or not that 11 came from Ms. Johnson or that was something I received 12 from the Taleo platform. That's been a while ago.</p> <p>13 BY MS. STEINER:</p> <p>14 Q. Mr. Hall, please, listen to my question. 15 That wasn't the intent of my question. My question is 16 a little different. Why was there a limit of this 17 about \$30 an hour on that job? Did you put that limit 18 there, or did somebody else say you can't pay over \$30 19 an hour for this job?</p> <p>20 A. I did not put any dollar amounts. That's 21 an HR call.</p> <p>22 Q. Then when you sent all that information 23 to HR about the job and wanted to hire Jane Doe, HR 24 told you it was too much for your budget, correct?</p> <p>25 A. That is what I recall.</p>

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1 Q. Has anyone questioned you at all before 2 today about what happened with you hiring or not hiring 3 Jane Doe in that position?	1 taught to Jane Doe's son and that she complained about 2 it?
4 A. No.	3 A. No, I did not.
5 Q. What was the department that you were in?	4 Q. Did you have any idea why the director of 5 School Choice was eliminated?
6 A. That I was in or the department I am in 7 now?	6 A. No idea.
8 Q. Has it changed?	7 MS. STEINER: Mr. Hall, thank you, very 8 much. That's all I have.
9 A. No. I just wasn't sure if you asked me 10 the department that I was in or that I am currently in.	9 MS. HARBISON: I don't have any 10 questions.
11 Q. You were and are currently in restorative 12 practices, correct?	11 MR. FOX: None from me, thank you. 12 (DEPOSITION CONCLUDED.)
13 A. Yes, ma'am.	13
14 Q. Your job hasn't changed since 2020, 15 correct?	14
16 A. That is correct.	15
17 Q. On the budget, where do you fall? What 18 is your number, do you know, the function number or 19 department number?	16
20 A. I actually do not have my pay stub in 21 front of me.	17
22 Q. Are you in charge of your department?	18
23 A. Yes, for the four staff -- five staff 24 that report to me.	19
25 Q. Who do you report to?	20
21	21
22	22
23	23
24	24
25	25
Page 19	Page 21
1 A. Ms. Kyla Krengel.	1 REPORTER'S CERTIFICATE
2 Q. What is her position?	2 STATE OF TENNESSEE)
3 A. Director of SEL.	3 COUNTY OF DAVIDSON)
4 Q. What is SEL?	4 I, Cristi G. Watson, Licensed Court Reporter in and 5 for the State of Tennessee, do hereby certify that the 6 foregoing proceedings were stenographically reported by me on 7 the 11th day of April, 2022, and that the foregoing transcript 8 constitutes a true and accurate record to the best of my 9 ability.
5 A. Social Emotional Learning.	10 I further certify that I am not related to nor an 11 employee of counsel or any of the parties to the action, nor 12 am I in any way financially interested in the outcome of this 13 case.
6 Q. Are you in the same department as Ms. 7 Krengel?	14 I further certify that I am duly licensed by the 15 Tennessee Board of Court Reporting as a Licensed Court 16 Reporter as evidenced by the LCR number following my name 17 below.
8 A. Yes.	18 IN WITNESS WHEREOF, I have hereunto set my official 19 hand on this 26th day of April, 2022.
9 Q. Gotcha. So in terms of the budget for 10 your department, that would be something Ms. Krengel 11 would handle, correct?	20
12 A. Yes, Ms. Krengel and HR.	21
13 Q. You don't prepare the budget, correct?	22 Cristi G. Watson
14 A. Correct.	23 CRISTI G. WATSON
15 Q. Now, did you hear anyone -- are you in 16 the central office?	24 Tennessee License No. 187
17 A. Yes, I am.	25
18 Q. Did you hear any discussion in central 19 office about that How to Make a Slave lesson that was 20 taught at Waverly Belmont?	
21 A. Not at central office, no.	
22 Q. Did you hear about it any other place?	
23 A. I am not a hundred percent certain, but I 24 want to say it was something that was on the news.	
25 Q. Did you know that that lesson plan was	

\$	approved 13:8,14 area 8:19,25 assistant 8:10,11 associate 8:10 attention 6:21 7:11,16 8:1 authority 13:17,19 aware 16:5	client 5:21 comparison 11:3 complained 20:1 concerned 12:16,17 CONCLUDED 20:12 confidence 7:25 conflict 6:15,17 conversation 9:13 Coordinator 5:19 correct 5:22 6:22,23 7:23 8:8 9:4 12:17 13:3,6,9 15:11 16:21 17:24 18:12,15,16 19:11,13,14 correctly 10:13 11:2 couple 10:25 criteria 13:5
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